1 2 3 4 5 6	MARY ANN SMITH Deputy Commissioner SEAN M. ROONEY Assistant Chief Counsel JUDY L. HARTLEY (State Bar No. 110628) Senior Counsel Department of Business Oversight 320 West 4 <sup>th</sup> Street, Ste. 750 Los Angeles, California 90013-2344 Telephone: (213) 576-7604 Facsimile: (213) 576-7181	
7	Attorneys for Complainant	
8	BEFORE THE DEPARTMENT OF BUSINESS OVERSIGHT	
9	OF THE STATE OF CALIFORNIA	
10		
11	In the Matter of:	CFLL License No.: 60DBO-45549
12	THE COMMISSIONER OF BUSINESS	ACCUSATION
13	OVERSIGHT,	
14	Complainant,	
15	vs.	) )
16	ADEL GAMIL BOUTROS,	
17		
18	Respondent.	) )
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20	The Complainant is informed and believes, and based upon such information and belief,	
21	alleges and charges Respondent as follows:	
22	I	
23	Introduction Introduction	
24	1. Adel Gamil Boutros ("Boutros") is licensed by the Commissioner of Business	
25	Oversight ("Commissioner" or "Complainant") as a finance broker pursuant to the California	
26	Finance Lenders Law ("CFLL") (Fin. Code §22000 et seq.). Boutros has his principal place of	
27	business located at 7359 Rosecrans Avenue, #A, Paramount, California 90723.	
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II

## **Failure to Meet Net Worth Requirements**

- 2. Pursuant to Financial Code section 22104 of the CFLL, all lenders and/or brokers licensed under the CFLL are required to maintain a net worth of \$25,000.00.
- 3. Pursuant to Financial Code section 22159, all licensees under the CFLL are required to file with the Commissioner an Annual Report that details its CFLL activities and also includes a financial statement for the calendar year ended December 31. On or about April 28, 2016, Boutros filed his Annual Report for the calendar year 2015 with the Commissioner. The 2015 Annual Report revealed that Boutros had a net worth deficiency of \$25,295.00.
- 4. On or about August 9, 2016, the Commissioner made written demand on Boutros to submit a balance sheet for the period ended June 30, 2016 showing compliance with the net worth requirements of Financial Code section 22104 on or before August 26, 2016. Boutros did not submit a balance sheet for the period ended June 30, 2016 as demanded.
- On or about September 29, 2016, further written demand was sent to Boutros to submit a balance sheet for the period ended September 30, 2016 showing compliance with the net worth requirements of Financial Code section 22104 on or before October 4, 2016 or the Commissioner would commence revocation proceedings. Boutros has yet to submit a balance sheet or any other financial statement that evidences compliance with the net worth requirements of Financial Code section 22104.

III

## **Revocation Statute**

- 6. Financial Code section 22714 provides in pertinent part:
  - (a) The commissioner shall suspend or revoke any license, upon notice and reasonable opportunity to be heard, if the commissioner finds any of the following:
  - (1) The licensee has failed to comply with any demand, ruling, or requirement of the commissioner made pursuant to and within the authority of this division.

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any rule or regulation made by the commissioner under and within the 2 authority of this division. . . . 3 IV4 **Conclusion** 5 7. The Commissioner finds that, by reason of the foregoing, Boutros has violated 6 Financial Code section 22104, and based thereon, grounds exist to evoke the finance lender license 7 of Boutros pursuant to Financial Code section 22714. 8  $\mathbf{V}$ 9 **Prayer** 10 WHEREFORE, IT IS PRAYED that: 11 Pursuant to Financial Code section 22714, the finance lender license of Respondent Adel 12 Gamil Boutros be revoked. 13 Dated: October 12, 2016 JAN LYNN OWEN 14 Los Angeles, California Commissioner of Business Oversight 15 By\_\_ 16 Judy L. Hartley Senior Counsel 17 **Enforcement Division** 18 19 20 21 22 23 24 25 26 27 28

(2) The licensee has violated any provision of this division or